

Daniel Szalkiewicz  
& Associates

23 West 73<sup>rd</sup> Street  
Suite 102  
New York, NY 10023

T: (212) 706-1007  
F: (646) 849-0033  
lawdss.com

April 16, 2024

**Via ECF**

United States Magistrate Judge Jessica S. Allen  
Frank R. Lautenberg U.S. Post Office & Courthouse Building  
2 Federal Square  
Newark, NJ 07102

***Re: John Doe v. Baila Sebrow  
United States District Court, District of New Jersey  
Case No.: 2:21-cv-20706***

Dear Judge Allen,

I represent the plaintiff, John Doe (“Plaintiff”), in the above-referenced matter. I write to request a court conference relating to Defendant’s Motion for Leave to Amend Defendant’s Answer and Counterclaims (DE 113).

Given Defendant was first ordered to submit such a motion on July 10, 2024 (DE 73), among other considerations, Plaintiff plans to file opposition to Defendant’s motion based on the absence of excusable neglect for the delay. Additionally, however, Defendant’s counterclaims will also require motion practice, as they have either previously been dismissed with prejudice or otherwise fail to state a cause of action upon which relief can be granted.

Plaintiff respectfully requests a court conference to discuss the Court’s procedural preferences in dealing with this matter and, if the Court is unable to accommodate this request, seeks – out of an abundance of caution – permission to file a brief in excess of the page limits set under Local Civil Rule 7.2. While Plaintiff endeavors to keep his filings as succinct as possible, the procedural background of this case is as absurd as it is relevant, and it is especially important that it – along with factual details – be included in Plaintiff’s filings due to Your Honor’s recent reassignment to the case.

Respectfully submitted,

DANIEL SZALKIEWICZ & ASSOCIATES, P.C.  
*/s/ Daniel S. Szalkiewicz*

By: Daniel S. Szalkiewicz, Esq.  
***daniel@lawdss.com***